

Exhibit F

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and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-52-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK INC.'S RESPONSES
TO PLAINTIFFS' SECOND SET OF
JURISDICTIONAL DISCOVERY**

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK, INC.'S RESPONSES
TO PLAINTIFFS' SECOND SET OF
JURISDICTIONAL DISCOVERY**

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), by and through its attorneys, and responds to Plaintiffs' Second Set of Jurisdictional Discovery as follows:

GENERAL OBJECTION

In the Court's Orders Re Scope of Jurisdictional Discovery (Doc. 47 in the *Caekaert* matter¹; Doc. 37 in the *Rowland* matter²), the Court concluded "[d]iscovery regarding WTPA's corporate relationship with WTNY from 1973 to 1992 is...appropriate." See Doc. 47 (in the *Caekaert* matter), p. 5; Doc. 37 (in the *Rowland* matter), p. 5. Accordingly, any discovery requests seeking information before 1973 or after 1992 are improper and outside the scope of Court-ordered limitations on jurisdictional discovery.

INTERROGATORIES

INTERROGATORY NO. 6: Identify each person who worked in the church's Service Department between 1960 and 1990.

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also vague as to the term "church's Service Department." Further, this request is overbroad, is not reasonably calculated to lead to the discovery of admissible information, is not proportional to the needs of the case, and infringes on the privacy rights of third parties.

¹ References to the *Caekaert* matter means Cause No. CV 20-52-BLG-SPW

² References to the *Rowland* matter means Cause No. CV 20-59-BLG-SPW.

INTERROGATORY NO. 7: Identify each person who worked in the church's Legal Department between 1960 and 1990.

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also vague as to the term "church's Legal Department." Further, this request is overbroad, is not reasonably calculated to lead to the discovery of admissible information, is not proportional to the needs of the case, and infringes on the privacy rights of third parties.

INTERROGATORY NO. 8: Please state how elders in each local congregation are selected and approved.

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: Please see documents produced by Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"), bates-numbered WTPA0028758-0028784.

INTERROGATORY NO. 9: Identify what the governing body does, where it is located, what it is responsible for, how it makes decisions, etc.?

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also irrelevant, is not reasonably calculated to lead to the discovery

discovery to the topic of the relationship between WTNY and WTPA during the relevant time period. Subject to and without waiving these objections: As to CAEKAERT/MAPLEY 002767-002770, 002735, 002780-002781, 002796, WTNY has made a reasonable inquiry, and the information it knows or can readily obtain is insufficient to enable it to either admit nor deny this request to the extent the referenced documents originated with another entity. As to CAEKAERT/MAPLEY 002782-002787, WTNY admits. As to CAEKAERT/MAPLEY 002791-002793, 003168, WTNY stands on its objections as they are outside the relevant time-period.

DATED this 8th day of March, 2021.

By: 

Guy W. Rogers / Jon A. Wilson /
Aaron M. Dunn

BROWN LAW FIRM, P.C.

*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*

VERIFICATION

Thomas Jefferson, Jr., states that he has read the foregoing (*Defendant WTNY's Responses to Plaintiffs' Second Set of Jurisdictional Discovery*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.


Thomas Jefferson, Jr.

Dated: 3/8/2021